

## **EXHIBIT A**



TRISTAN G. AXELROD  
direct dial: 617.856.8456  
T Axelrod@brownrudnick.com

February 18, 2020

**VIA EMAIL**

Paul Lockwood, et al.  
Skadden, Arps, Slate, Meagher & Flom LLP  
One Rodney Square  
P.O. Box 636  
Wilmington, Delaware 19899  
*Counsel to the UBS Parties*

**RE: ERS PROMESA Lien Tracing and Ultra Vires Document Productions**

Counsel:

In connection with the Lien Scope and Ultra Vires proceedings in the PROMESA Title III cases,<sup>1</sup> ERS is producing responsive, non-privileged documents bearing Bates ranges: ERS\_0026588 - ERS\_0071788. The production includes documents that are designated as Confidential under the Stipulation and Order for the Production and Exchange of Confidential Information, dated January 10, 2020 (Case No. 17-03566-LTS, ECF No. 776) (the “Order”), and should be treated accordingly.

Pursuant to UBS Financial Services Inc. of Puerto Rico’s and UBS Trust Company of Puerto Rico’s (the “UBS Parties”) informative motion and stipulation executed January 13, 2020 (Case No. 17-03566-LTS, ECF No. 781), the UBS Parties agreed, among other things, to be bound by the terms of the Order by expressly agreeing to comply with the terms and conditions of the Order. ERS makes this production subject to the UBS Parties’ informative motion and stipulation. Pursuant to the parties meet and confer discussions, we do not object to the use of any documents produced hereby in *Administracion de los Sistemas de Retiro de los Empleados del Gobierno y la Judicatura de Puerto Rico y Otros v. UBS Financial Services y Otros*, Civil Num. K AC2011-1067 (the “Commonwealth Proceeding”) provided the UBS Parties abide by the terms of the Order. ERS reserves all rights, including the right to object to the use of any documents in any litigation under appropriate evidentiary rules and on any substantive basis, including but not limited to the basis of relevance.

Any further productions are of course subject to the same restrictions, unless otherwise noted.

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<sup>1</sup> Lead Case No. 17-03283-LTS (D.P.R.), Adv. Pro. Nos. 19-366, 19-367, 19-356, 19-357, 19-359, 19-361.



Counsel to the UBS Parties  
February 18, 2020  
Page 2

VIA EMAIL

Sincerely,

**BROWN RUDNICK LLP**

Tristan G. Axelrod

cc:

Danielle D'Aquila

Sunni P. Beville

Giselle Lopez

Harold Vicente

Harold Vicente Colon

Federico Hernandez Denton

Francisco Pujol

Jose A. Andreu Fuentes